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*Attorney for Defendants
Jump Trading, LLC and
Jump Crypto Holdings LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AUSTIN WARD, DAVID KREVAT, and NABIL MOHAMAD, individually and on behalf of all others similarly situated

Case No. 3:25-cv-03989-PHK

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
TIME TO RESPOND TO MOTION
FOR RULE 11 SANCTIONS**

Hon. Peter H. Kang

JUMP TRADING, LLC; JUMP CRYPTO HOLDINGS LLC; and DOES 1-10

Defendants.

1 Pursuant to Local Rule 6-2, Defendants Jump Trading, LLC and Jump Crypto Holdings LLC
2 (collectively, "Jump Defendants") and Plaintiffs Austin Ward, David Krevat, and Nabil Mohamad
3 (collectively, "Plaintiffs") by and through their counsel in the above-captioned action, hereby
4 stipulate:

5 WHEREAS, Jump Defendants served counsel for Plaintiffs with the Notice of Motion and
6 Motion for Sanctions Pursuant to Rule 11 of the Federal Rules of Civil Procedure and accompanying
7 Appendix A (the "Motion for Sanctions") on August 1, 2025;

8 WHEREAS, the 21-day safe harbor provision mandated by Federal Rule of Civil Procedure
9 11(c)(2) expired on August 22, 2025;

10 WHEREAS, the Court so-ordered the Parties' stipulation continuing the Initial Case
11 Management Conference and all other deadlines set forth in the Initial Case Management Order and
12 extending the Parties' time to respond to the Complaint on May 30, 2025 (Dkt. No. 14);

13 WHEREAS, there have been no other previous time modifications in this case, whether by
14 stipulation or Court order;

15 WHEREAS, the parties have conferred and agreed, subject to approval of the Court, to a
16 briefing schedule for the Motion for Sanctions;

17 WHEREAS, this stipulation will neither prejudice the interests of the Parties or the Court;

18 NOW THEREFORE, counsel for Plaintiffs and Jump Defendants stipulate and agree that:

- 19 1. Jump Defendants shall file their Motion for Sanctions on or before September 26, 2025;
- 20 2. Plaintiffs' opposition, if any, shall be filed on or before October 24, 2025;
- 21 3. Jump Defendants' reply brief in further support of their Motion for Sanctions, if any,
22 shall be filed on or before November 14, 2025;

23 IT IS SO STIPULATED.

25 Dated: September 25, 2025

1 Respectfully submitted,

2
3 KOBRE & KIM LLP

4 /s/ Jonathan D. Cogan

5 Jonathan D. Cogan

6 Jonathan D. Cogan (admitted *pro hac vice*)
7 Steven W. Perlstein (admitted *pro hac vice*)
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16 *Attorneys for Defendants Jump Trading, LLC*
and Jump Crypto Holdings LLC

ERICKSON KRAMER OSBORNE LLP

6 /s/ Julie C. Erickson

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17 *Attorneys for Plaintiffs*

AUSTIN WARD, DAVID KREVAT, and NABIL
MOHAMAD

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

2 Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this
3 document has been obtained from each of the above signatories.

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5 By: /s/ Jonathan D. Cogan
6 Jonathan D. Cogan
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1 **[PROPOSED] ORDER**
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3 Pursuant to the Stipulation, IT IS SO ORDERED
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5 Dated: Sept. 25, 2025
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1 
2 HON. PETER H. KANG
3 United States Magistrate Judge